

3:52 pm, Mar 20 2023

AT GREENBELT
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY DH Deputy

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

IN THE MATTER OF THE SEARCH OF:

**INFORMATION ASSOCIATED WITH
THE CELLULAR TELEPHONE
NUMBER (240) 855-2346 STORED AT
PREMISES MAINTAINED BY VERIZON**

CASE NO. 23-mj-201-AAQ

Filed Under Seal

**MOTION TO SEAL SEARCH WARRANT APPLICATION
AND SUPPORTING AFFIDAVIT**

Comes now the United States of America, by and through its Attorneys, Erek L. Barron, United States Attorney for the District of Maryland, and Bijon A. Mostoufi, Assistant United States Attorney for said District, and hereby moves this Honorable Court for an Order sealing the above-referenced matter, and in support thereof states:

1. The United States is conducting a criminal investigation into violations of Wire Fraud (18 U.S.C. § 1343), Bank Fraud (18 U.S.C. § 1344), Wire Fraud and Bank Fraud Conspiracy (18 U.S.C. § 1349), and Money Laundering (18 U.S.C. § 1956). Special Agent Cornell's affidavit sets forth nonpublic information concerning the investigation, including information from grand jury subpoena responses. The government submits that disclosure of the information in the search warrant affidavit at this time could jeopardize the investigation, cause individuals to flee, result in the destruction of evidence, and/or endanger certain individuals, including the agents seeking to interview and/or arrest subjects of the investigation.

2. The United States submits that the requested sealing is necessary and that there are no less restrictive means to maintain confidentiality.

3. To seal an affidavit for a search warrant, the government must demonstrate that:
(1) there is a compelling government interest requiring materials to be kept under seal and (2)


there is no less restrictive means, such as redaction, available. *In re Search Warrants Issued on April 26, 2004*, 353 F. Supp. 2d 584 (D. Md. 2004).

4. The procedures for sealing are set forth in *Baltimore Sun Co. v. Goetz*, 886 F.2d 60 (4th Cir. 1989). “The judicial officer may explicitly adopt the facts that the government presents to justify the sealing.” *Id.* at 65. This motion and the Court’s reasons for sealing should also be sealed. *Id.* Notice of the sealing is satisfied by the docketing of the order sealing the documents. *Id.*

WHEREFORE, the government respectfully requests that the above captioned search warrant, all documents submitted in support of the search warrant application, along with this motion, and the Court’s reasons for sealing, be placed under seal, until further order of the Court.

Respectfully submitted,

Erek L. Barron
United States Attorney

By:  Digitally signed by BIJON
MOSTOUFI (Affiliate)
Date: 2023.01.17
16:30:31 -05'00'

Bijon A. Mostoufi
Assistant United States Attorney

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**ORDER TO SEAL SEARCH WARRANT APPLICATION
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Upon review of the Motion of the United States of America, this Court accepts the proffer of facts and statement of reasons to justify the sealing as requested.

THEREFORE, it is **ORDERED** that the above-captioned search warrant, and all documents submitted in support of the application for the search warrant in this matter, along with this motion, shall be **SEALED** until further order of this court.

It is further **ORDERED** that the Clerk of the Court provide a copy of this Order to the United States Attorney's Office.

1/18/2023

Date



Honorable Ajmel A. Quereshi
United States Magistrate Judge